



File Code: 1950
Date: May 9, 2016

Dear Interested Party

I am approving administrative changes to the monitoring programs associated with the Land and Resource Management Plans (LRMP) for the Routt National Forest (RNF Plan), the Medicine Bow National Forest (MBNF Plan) and the Thunder Basin National Grassland (TBNG Plan) in order to comply with the USDA Forest Service 2012 Planning Rule.

Background

The 2012 Planning Rule, codified at 36 Code of Federal Regulations Part 219 (36 CFR 219), guides LRMP monitoring across the Forest Service. All LRMP monitoring programs are required to conform to the Planning Rule by May 9, 2016. The strategy we used to identify modifications to our monitoring program focused on addressing the purpose of the LRMP monitoring program as described in 36 CFR 219.12(a)(1), which includes the need for monitoring information that will enable the responsible official to determine if a change in plan components is necessary.

Each LRMP monitoring program must contain one or more monitoring questions and associated indicators addressing each of the following eight requirements, which are noted at 36 CFR 219.12(a)(5):

1. The status of select watershed conditions.
2. The status of select ecological conditions including key characteristics of terrestrial and aquatic ecosystems.
3. The status of focal species to assess the ecological conditions required under 36 CFR 219.9.
4. The status of a select set of the ecological conditions required under 36 CFR 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern.¹
5. The status of visitor use, visitor satisfaction, and progress toward meeting recreation objectives.
6. Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.
7. Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities.
8. The effects of each management system to determine that they do not substantially and permanently impair the productivity of the land (16 U.S.C. 1604(g)(3)(C)).

This administrative change is a modification to monitoring elements found in Chapters 4: *Monitoring and Evaluation* of the RNF, MBNF, and TBNG Plans. We retained those elements of the original monitoring programs that address the eight requirements listed above and developed new elements where needed to address those eight requirements. We removed elements that do not address the eight requirements.

¹ At this time, species of conservation concern have not been identified for the Medicine Bow – Routt National Forests and Thunder Basin National Grassland therefore the LRMP monitoring program will not address species of conservation concern.



Under the 2012 Planning Rule, the LRMP monitoring program will consist of only monitoring questions and associated indicators to evaluate if plan components are effective and appropriate, and if management is effective in maintaining or achieving progress toward desired conditions and objectives for the plan area.

Additional information for implementing the LRMP monitoring program may be documented in a separate monitoring implementation guide that will, for example, identify methods for data collection, how the data are stored, and responsibilities for managing monitoring information. The implementation guide will not be part of the LRMP and could be changed as needed if, for example, more efficient methods of gathering data are developed.

The LRMP monitoring information will be evaluated every two years. The monitoring evaluation report must indicate whether or not a change to the plan, management activities, the monitoring program, or a new assessment may be warranted based on the new information. The monitoring evaluation report must be used to inform adaptive management of the plan area. The publication date of the first biennial monitoring evaluation report is expected to be no later than two years from the date of this letter of approval.

Public Comment and Forest Service Responses

The 30-day public comment period began with publication of a letter describing the proposed monitoring plan transition, posted to the Medicine Bow – Routt National Forests and Thunder Basin National Grassland (MBRTB) website on March 16, 2016. Additional information provided on the website included links to the 2012 Planning Rule (36 CFR 219) and the current RNF, MBNG, and TBNG Plans. Paper copies of the letter were sent to known interested parties, state agencies, and local governments.

The MBRTB received 10 responses to the request for public comment. These comments have been categorized into a list of concerns, many of which were shared by multiple commenters. Concerns from commenters and the corresponding Forest Service responses are below.

Concern #1: Will this monitoring transition include changes in management activities or the implementation of new projects associated with monitoring results?

Forest Service Response 1: The modifications to the LRMP monitoring programs are being conducted under the administrative change procedures as provided in the 2012 Planning Rule found at 36 CFR 219.13(c). This administrative action will not involve the implementation of new management activities. The only changes will be in the data collection duties of Forest Service personnel and the content of biennial monitoring reports. The biennial monitoring reports will be used by the Forest Supervisor to determine if a change in management direction is needed. If such a change is indicated, the Forest Supervisor will then determine the most efficient way to make those changes. This could include proposed changes to LRMP components, new management activities or modification of the monitoring plan itself. Proposed activities will be subject to review, as under the requirements of the National Environmental Policy Act. Public participation and the opportunity to comment would be part of that process, as with any other proposed Forest Service action.

Concern #2: Is the monitoring transition designed to correct or compensate for deficiencies in the current Land and Resource Management Plans? How will this affect other LRMP amendments?

Forest Service Response 2: The monitoring chapters of our LRMPS currently do not comply with

the 2012 Planning Rule. Our monitoring transition is designed to correct this deficiency by addressing the eight requirements discussed above and codified at 36 CFR 219.12(a)(5). This involved taking the elements from the original LRMP monitoring plans and aligning them with the requirements of the final 2012 Planning Rule and developing new elements where needed. This administrative change will not alter any LRMP goals, objectives, standards, guidelines, or management direction. It will not affect other amendments that may occur to any of the Forest or Grassland LRMPs. This monitoring transition will also improve consistency between the consolidated units of the MBRTB by creating a monitoring plan that is the same across all three plan areas.

Concern #3: Why is the Forest Service continuing to collect monitoring data when ample data already exists for these resources?

Forest Service Response 3: The new monitoring plan makes use of existing monitoring efforts and databases developed by the Forest Service and other cooperating agencies and organizations and does not propose an entirely novel or independent approach to monitoring. Much data already exists pertaining to forest, rangeland, and watershed health. Continued monitoring and data collection is needed to inform the management of resources on the plan area, track relevant changes, measure management effectiveness, and inform adaptive management into the future as conditions change on the ground. The monitoring plan is a tool to help inform decision making and identify if the Forest Service is meeting the goals and objectives in the LRMPs.

Concern #4: The monitoring plan, as outlined in the March 16th letter, is not detailed or descriptive about methods, frequency, or standards of data collection. It does not provide enough information for Forest Service personnel to understand how to implement monitoring. How will the agency insure that data collection is adequate and that future generations of employees follow the same protocols?

Forest Service Response 4: The current monitoring plan contains monitoring questions and indicators only and is not intended to be a stand-alone document. A separate monitoring implementation guide will be developed that will identify data collection responsibilities, scientific protocols, frequency of monitoring, data storage procedures, responsibilities for reporting and managing monitoring information, and other details. The implementation guide will not be part of the LRMPs and could be changed as needed if, for example, more efficient methods of gathering data are developed. With the development and use of the monitoring implementation guide the Forest Service intends to standardize the LRMP monitoring program across units and among personnel.

Concern #5: There are many important items that are not included in the monitoring plan. For example, there are measures of watershed and rangeland health, timber productivity, and the quality of forage for livestock and wildlife that are not included in the proposed monitoring transition. There are also several species listed as threatened under the Endangered Species Act (ESA) that will not be monitored as part of this plan. Why were important items omitted, will they still be monitored, and can they be added to the plan in the future?

Forest Service Response 5: The MBRTB was mandated to create a LRMP monitoring program that informs integrated resource management and allows the Forest Service to adapt to changing conditions, conforms to the eight requirements of the 2012 Planning Rule, and is feasible to implement. The 2012 Planning Rule states that “at a minimum, the plan monitoring program must contain one or more monitoring questions and associated indicators addressing the following eight items (see CFR 219.12(a)(5)(i-viii))”. The MBRTB has followed these guidelines and created at least one monitoring item addressing each of the eight requirements. Although there are other elements

and items that could be monitored and that may provide valuable information, a lengthy monitoring plan is not considered feasible given staffing and budgetary constraints.

A Forest Service interdisciplinary team was formed to determine the most effective and informative LRMP monitoring metrics and public comment was taken into consideration during monitoring plan development. Should this monitoring plan prove insufficient or ineffective at informing decision makers, it can be altered using an administrative change, including adding new questions and indicators. We expect this monitoring plan to be dynamic and change over time as new information and science becomes available. It will also be reevaluated and may be revised in the future during a LRMP revision process.

The LRMP monitoring program is not the only monitoring that is occurring on the MBRTB. There is additional monitoring associated with other authorities and programs. For example, other species federally listed under the ESA are monitored by Forest Service personnel in partnership with the US Fish and Wildlife Service and the states of Wyoming and Colorado. Although not all listed species are included in the LRMP monitoring program and will not be documented in the LRMP monitoring reports, other monitoring will continue and information on the status of these species is available from the Forest Service, US Fish and Wildlife Service, and the states.

Approval of Monitoring Transition

Based on the proposed monitoring plan transition discussed in my March 16, 2016 letter requesting public comment, the comments that were received, and incorporated changes suggested by an interdisciplinary team on the MBRTB, I approve the administrative changes for the MBRTB monitoring plan transition. The new monitoring plan now aligns with the 2012 Planning Rule and is found in Chapters 4 of the RNF, MBNG, and TBNG Plans.

Information specific to the monitoring transition can be found at:

Forest Plan Monitoring Transition

<http://www.fs.usda.gov/main/mbr/landmanagement/planning>

2012 Planning Rule

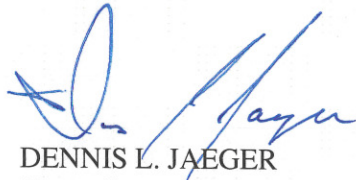
<http://www.fs.usda.gov/detail/planningrule/home>

RNF Plan, MBNF Plan and TBNG Plan

<http://www.fs.usda.gov/main/mbr/landmanagement/planning>

If you have questions about the administrative change or would like more information, please contact Aaron Voos (atvoos@fs.fed.us or (307) 745-2323). Thank you for your interest in the management of the Medicine Bow-Routt National Forests and Thunder Basin National Grassland.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Jaeger", is written over the printed name.

DENNIS L. JAEGER
Forest Supervisor

cc: Aaron Voos, Kelle Reynolds, Melissa Martin, Trey Schillie